

Presentment Date: August 25, 2017
Presentment Time: 10:00 AM

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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IN RE:

Case No. 16-23745(RDD)

Leon Amiel and Tamm Amiel,

Chapter 13

Debtors.

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NOTICE OF PRESENTMENT AND OPPORTUNITY FOR HEARING

PLEASE TAKE NOTICE that upon the annexed application of Linda M. Tirelli, the undersigned will present the annexed proposed Order to the court, seeking approval for Debtors to enter a loan modification with JPMorgan Chase Bank, NA, to the Honorable Judge Robert D. Drain, United States Bankruptcy Judge, Southern District of New York, for signature on August 25th, 2017 at 10:00AM.

PLEASE TAKE FURTHER NOTICE that unless written objections to the proposed Order with proof of service, are filed with the Clerk of the Court and courtesy copies delivered to the Bankruptcy Judge's chambers at least three (3) days before the date of presentment there will not be a hearing and the Order may be signed on default.

PLEASE TAKE FURTHER NOTICE that if written objection is timely filed, the Court will notify the moving and objecting parties of the date and time of the hearing and of the moving party's obligation to notify all other parties entitled to receive notice. The moving and objecting parties are required to attend the hearing, and failure to attend in person or by counsel may result in relief being granted or denied on default.

Dated: August 4, 2017
White Plains, New York

/s/Linda M. Tirelli
Linda M. Tirelli, Esq.
Attorney for Debtor
Tirelli & Wallshein, LLP
50 Main Street, Suite 405
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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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IN RE:

Leon Amiel and Tammy Amiel,

Case No. 16-23745(RDD)

Chapter 13

Debtors.

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**AFFIRMATION IN SUPPORT OF DEBTORS' APPLICATION FOR AN ORDER APPROVING LOAN
MODIFICATION WITH JPMORGAN CHASE BANK NA**

Linda M. Tirelli, an attorney at law duly admitted to the Southern District of New York,
affirms as follows:

1. I am the attorney for Debtors, Leon Amiel and Tammy Amiel in the instant
bankruptcy proceeding.
2. I submit this affirmation in support of Debtors' application seeking an Order
approving a loan modification between Debtors and JPMorgan Chase Bank, NA.
3. On December 23, 2016, the instant voluntary petition was filed under Chapter 13
of the Bankruptcy Code in the Southern District of New York, White Plains Division, Case
Number 16-23745.
4. JPMorgan Chase Bank, NA. ("JPMORGAN") is a secured creditor in the instant
bankruptcy proceeding. JPMORGAN holds a perfected security interest (mortgage) on Debtors'
primary residence, located at 18 Denver Drive, New City, New York 10956.
5. Debtors and JPMORGAN have worked together to reach an agreeable loan
modification plan.
6. In February of 2017, the Debtors were offered a permanent modification by
JPMORGAN. A copy of the parties' modification plan is attached hereto as **Exhibit A**.

7. The approval of this modification will have no adverse impact on Debtors' creditors.

8. Debtors therefore requests that this Honorable Court approve this loan modification for entry and recording.

WHEREFORE, the Debtors respectfully request that the Court grant the motion to approve the loan modification with JPMorgan Chase Bank, NA and for such other and further relief as this Court may deem just and proper.

Dated: August 4, 2017
White Plains, New York

/s/Linda M. Tirelli
Linda M. Tirelli
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